

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327
THIS DOCUMENT RELATES TO: Ethicon Wave 1 cases listed in Exhibit A	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**PLAINTIFFS' MOTION TO EXCLUDE THE GENERAL CAUSATION
OPINIONS OF DEFENSE EXPERT MICHAEL P. WOODS, M.D.**

COME NOW Plaintiffs in the above-captioned Ethicon Wave 1 cases to respectfully request that this Court preclude Michael P. Woods, M.D., a proffered expert witness for the Defendants, from giving any opinions regarding the design of Defendants' TVT or TVT-O meshes, regarding the adequacy of the warnings for those products, or regarding complication rates that he claims to have developed in his practice. Dr. Woods has been designated as an expert in all of the cases listed in the caption above.

The grounds for this motion are stated in the accompanying Memorandum in Support of Plaintiffs' Motion.

Dated: April 21, 2016

Respectfully submitted,

/s/ Thomas P. Cartmell

Thomas P. Cartmell, Esq.

Jeffrey M. Kuntz, Esq.

Wagstaff & Cartmell LLP

4740 Grand Avenue, Suite 300

Kansas City, MO 64112

Telephone: (816) 701-1100

Facsimile: (816) 531-2372

tcartmell@wcllp.com

jkuntz@wcllp.com

/s/ D. Renee Baggett

Bryan F. Aylstock, Esq.

Renee Baggett, Esq.

Aylstock, Witkin, Kreis and Overholtz, PLC

17 East Main Street, Suite 200

Pensacola, Florida 32563

Telephone: (850) 202-1010

Facsimile: (850) 916-7449

baylstock@awkolaw.com

rbaggett@awkolaw.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document on April 21, 2016, using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/Thomas P. Cartmell

Attorney for Plaintiffs

INDEX OF EXHIBITS

Exhibit A: List of cases on which Dr. Woods is designated

Exhibit B: Woods TVT-O Deposition, March 31, 2016

Exhibit C: Woods Expert Report for Ethicon Wave 1 Cases

Exhibit D: Woods TVT Deposition, October 5, 2015

Exhibit E: Elbert Deposition, Dec. 23, 2014

Exhibit F: Owens Deposition, Sept. 13, 2014